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December 21, 2020

**VIA ECF**

The Honorable Joseph F. Bianco  
Visiting Circuit Judge (sitting by designation in below referenced matter)  
U.S. Court of Appeals for the Second Circuit  
100 Federal Plaza  
Central Islip, New York 11722

Re: **United States of America v. Kenner, Cr. No. 13-607 (JFB)**

Dear Judge Bianco,

Per the Court's direction at the December 10, 2020 hearing in the above-referenced matter, Danske Bank A/S London Branch ("Danske") submits this supplement to its summary judgment motion to set forth, based upon the Court's oral ruling, the calculation of the undisputed amounts of Danske's claim. As set forth below, Danske's undisputed claim, based upon the Court's ruling is no less than \$176,272,487.13. In addition, Danske writes to clarify the record as to the two issues the Court found were in dispute. As set forth more fully below, there is no basis for additional discovery.

Finally, Danske respectfully submits that it is imperative that the Court either allow Danske to foreclose on the property pursuant to the underlying loan agreements or require the government to present a plan for an expedited interlocutory sale.

**1. Relevant Factual Background Regarding the Lehman Loan and Post-2010 Loans.**

In order to assist the Court, we set forth briefly the factual record regarding the underlying loans at issue in this ancillary proceeding. Under the 2006 loan agreement, Lehman Brothers Holdings Inc. ("Lehman") agreed and was obligated to lend to the Borrower up to \$125 million (the "Lehman Loan"). MSJ. Ex. 4 (Dkt. No. 850-4) at DANSKE\_0010558 (attached hereto as Exhibit 1).<sup>1</sup> At the time of Lehman's bankruptcy, Lehman had advanced \$107,529,665.05. MSJ

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<sup>1</sup> The exhibits attached to this submission include loan agreements that were exhibits to Danske's motion for summary judgment. For ease of review and because the Court received the full loan agreements with Danske's motion for summary judgment, Danske has attached hereto excerpts of these loan agreements and has, where possible, highlighted the relevant portions of exhibits.



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The Honorable Joseph F. Bianco  
December 21, 2020  
Page 2

Ex. 32 (Dkt. No. 853-2) at DANSKE\_0016009 (attached hereto as Exhibit 2). By January 13, 2009, when Danske formally assumed Lehman's rights, obligations, and interest in the Lehman Loan under the Omnibus Assignment and Assumption Agreement, Lehman had advanced approximately \$107,538,327.83. *See* MSJ Ex. 10 (Dkt. No. 850-10) at DANSKE\_0015614 (attached hereto as Exhibit 3); MSJ Ex. 42 (Dkt. No. 854-2) at DANSKE\_0015590 (attached hereto as Exhibit 4). The additional \$8,662.78 was advanced to cover a service fee. Ex. 3 (MSJ Ex. 10 (Dkt. No. 850-10) at DANSKE\_0015614). In acquiring the Lehman Loan, Danske assumed "all of [Lehman's] **obligations** as Lender," MSJ Ex. 35 (Dkt. No. 853-5) at DANSKE\_0012223 (emphasis added) (attached hereto as Exhibit 5) under the loan document—including the obligation to fund up to \$125 million. Ex. 1 (MSJ Ex. 4 (Dkt. No. 850-4) at DANSKE\_0010558). As a result, as of January 2009, the Lehman Loan obligated Danske to lend to the Borrower an additional approximately \$18 million above the already lent \$107 million. Ex. 1 (MSJ Ex. 4 (Dkt. No. 850-4) at § 4.1, DANSKE\_0010572). On January 14, 2009, the day after Danske executed the Omnibus Assignment and Assumption Agreement, Danske advanced \$1,600,000 to the Borrower in two transactions of \$1,591,187.72 and \$8,812.28. DANSKE\_0016726 (attached as Exhibit 6); Ex. 3 (MSJ Ex. 10 (Dkt. No. 850-10) at DANSKE\_0015614). After advancing that \$1.6 million, Danske, as lender of record, remained obligated to advance \$15,861,672.17 million to the Borrower under the Lehman Loan.

In March 2009, the parties executed the Amended and Restated Loan Agreement. MSJ Ex. 40 (Dkt. No. 853-10) (attached hereto as Exhibit 7). Under the March 2009 amended loan agreement, the Lehman Loan of \$125 million was split into two Facilities— Facility A and Facility B. Ex. 7 (MSJ Ex. 40 (Dkt. No. 853-10) at DANSKE\_0013870-71). The March 2009 amended loan agreement maintained the total funding obligation of \$125 million that Danske assumed in January 2009 in the Omnibus Assignment and Assumption Agreement. Under the March 2009 amended loan agreement, Danske's funding obligation for Facility A was capped at the principal amount of \$109 million and for Facility B, which was structured as a revolving loan, was capped at the principal amount of \$16 million. *Id.* Accordingly, Facility A and \$16 million of Facility B reflect principal advances that Danske was obligated to make. Thus, Danske was obligated to fund the full \$125 million due under those Facilities. A failure to fund the full \$125 million would have constituted a breach by Danske Bank of its obligations as a lender under the loan agreement. *See, e.g.,* Ex. 1 (MSJ Ex. 4 (Dkt. No. 850-4) at § 4.1, DANSKE\_0010572); Ex. 7 (MSJ Ex. 40 (Dkt. No. 853-10) at § 4.1, DANSKE\_0013886).

Between March 2009 and December 2011, unpaid interest accrued and was capitalized to \$13.8 million. Under the 2009 amended loan agreement—as well as under the Lehman Loan— Danske was entitled to capitalize unpaid interest. The parties modified the loan agreement again in April 2013 and, among other things, increased the principal balance of Facility A to \$123,500,000 to reflect the unpaid interest that was capitalized—but did not make any additional principal loan advances under Facility A. DANSKE\_0015375, (attached as Exhibit 8); MSJ Ex. 57 (Dkt. No. 856-2) at DANSKE\_0015736 (attached hereto as Exhibit 9).



The Honorable Joseph F. Bianco  
December 21, 2020  
Page 3

It was not until January 2010 that Danske began advancing funds above the original Lehman obligation of \$125 million. These new agreed-to loans consisted of the following

- January 2010: \$4 million increase in funding commitment for Facility B, MSJ Ex. 46 (Dkt. No. 854-6) at DANSKE\_0010810 (attached hereto as Exhibit 10);
- April 2013: \$3 million funding commitment for new Facility D<sup>2</sup>, MSJ Ex. 51 (Dkt. No. 855-1) at DANSKE\_0011087-88 (attached hereto as Exhibit 15); and
- April 2014: \$10 million increase for replacement Facility C (which consolidated the April 2013 Facilities C and D), therefore creating a new Facility C at a total of \$15 million. MSJ Ex. 58 (Dkt. Nos. 856-3, 856-4) at DANSKE\_0012238-39 (attached hereto as Exhibit 11).

Since the April 2014 Third Amended and Restated Loan Agreement establishing the new Facility C, there have been no new commitments to loan additional funds.

## **2. Danske's Undisputed Claim Amounts to \$176.27 Million and No Setoff Should Apply.**

### **a) Danske's Undisputed Claim Amounts to \$176.27 Million.**

Based on the Court's ruling recognizing the initial Lehman loan, the following amounts should be recognized because they emanate directly from the original Lehman loan:

Undisputed Amounts of the Principal Balance Owed Under Facilities A and B	\$106,102,601
PPF	\$45,000,000
Interest Due (calculated on \$106.1 million undisputed amount)	\$25,169,893.13
<b>TOTAL UNDISPUTED AMOUNT</b>	<b>\$176,272,487.13</b>

These amounts are specifically explained below.

### **i. Danske Has an Undisputed Claim under Facility A and Facility B of \$106,102,601.**

The Court recognized the initial Lehman loan that Danske acquired. At the time Danske acquired the loan, Lehman had advanced over \$107 million. As explained above, by acquiring the

<sup>2</sup> In April 2013, Danske reduced Facility B's credit limit to \$18 million and transferred \$2 million of the then-outstanding \$20 million balance to a new Facility C.



The Honorable Joseph F. Bianco  
 December 21, 2020  
 Page 4

loan, Danske was required to fund the additional \$18 million left to be advanced on the \$125 million loan. *See, e.g.*, Ex. 1 (MSJ Ex. 4 (Dkt. No. 850-4) at § 4.1, DANSKE\_0010572); Ex. 5 (MSJ Ex. 35 (Dkt. No. 853-5) at DANSKE\_0012223). When it acquired the Lehman Loan, Danske began advancing the remaining \$18 million. Those amounts, like the amounts already advanced by Lehman, are necessarily subject to the Court's finding and thus should be recognized because they were not additional loans. Danske's \$106.1 million claim as to Facility A and B each emanate from the original Lehman obligation to lend the Borrower \$125 million. Set forth below is a summary listing the basis for Danske's calculation of the amounts owed under Facilities A and B:

- January 13, 2009: Danske acquired the Lehman Loan, which was then drawn at \$107,538,327.83 of the \$125 million total.
- January 14, 2009: Danske advances \$1,600,000, increasing the amount loaned to \$109,138,327.83 of the \$125 million total.
- March 6, 2009: Danske fulfills its funding obligations as Lehman's successor by advancing approximately \$16,000,000 through Facility B, a then-revolving credit facility.
- April 29, 2013: Danske capitalized \$14,361,672.17<sup>3</sup> in unpaid interest accrued under Facility A, which when added to the January 2009 balance of \$109,138,327.83 increased the principal balance of Facility A to \$123,500,000.00. To be clear, the \$14,361,672.17 did not mean that Danske advanced new monies—rather as permitted under the loan agreement, Danske added the total amount of unpaid interest that had accrued under Facility A to the Facility A principal balance.<sup>4</sup>
- Between 2015 and 2017, the Borrower repaid \$27,099,993 which was applied to the principal balance of Facility A, leaving a balance of \$96,400,007. As of September 30, 2020, and currently, the balance remains \$96.4 million. DANSKE\_0015363-66, DANSKE\_0015368-70 (attached hereto as Exhibit 12); Danske Facility A March 31, 2017 and August 9, 2017 Statements at

<sup>3</sup> This amount is comprised of \$13,860,658.18 of capitalized unpaid interest and \$428,375.28 of closing costs due on execution of the 2013 amended loan agreement. Ex. 9 (MSJ Ex. 57) (Dkt. No. 856-2) at DANSKE\_0015736).

<sup>4</sup> The government argues that the capitalized interest is in dispute. It is not. Regardless of whether interest was capitalized, Danske was due to be paid interest and the government has not disputed the calculation of the interest due.



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The Honorable Joseph F. Bianco  
December 21, 2020  
Page 5

DANSKE\_0015704-5 (attached hereto as Exhibit 13); Supp. Daniel Decl. Ex. 1 (Dkt. No. 925-1) at DANSKE\_0017872 (attached hereto as Exhibit 17).

- As of September 30, 2020, and currently, Facility B has a principal balance of \$18 million. Supp. Daniel Decl. Ex. 2 (Dkt. No. 925-2) at DANSKE\_0017873 (attached hereto as Exhibit 18). The undisputed portion of this balance is \$16 million. Combined with the \$96,400,007 principal balance of Facility A, Danske's total undisputed claim under the Lehman Loan totals \$112.4.
- Reducing the total amount of Danske's undisputed claim by the \$6.297 million the government challenges,<sup>5</sup> Danske's undisputed claim as to Facilities A and B totals \$106,102,601.

In sum, taking into account the Court's ruling that \$6,297,406 million is in dispute, Danske's claim as to the Lehman Loan totals **\$106,102,601** (\$112.4 million less \$6.297 million).<sup>6</sup>

**ii. Danske Has an Undisputed Claim in the Profit Participation Fee of \$45 Million.**

There is no dispute that Danske is entitled to at least \$45 million of the \$50 million PPF. When directly asked by the Court whether it disputed this amount, the government stated "with regards to the PPF, *I believe the \$45 million, I don't believe that would be contested. We are contesting the \$5 million.*" 12/10/20 Hearing Tr. at 10:3-21 (emphasis added). The government went on to state that it believed that the PPF was calculated on a certain percentage and that the government never got those documents. *Id.* at 11. That is not correct. Danske produced to the government loan agreements along with other documents to support its claim to the PPF in October 2019 (DANSKE\_0013621) and August 2020 (DANSKE\_0017827). Further, the government's consultant recognized the formula as set forth in the 2009 Amended and Restated Loan Agreement Ex. 7 (MSJ Ex. 40 (Dkt. No. 853-10) at DANSKE\_0013891-94) that was later modified and amended to a specific \$50 million, Fedkenheuer Decl. (Dkt. No. 911) ¶ 30. The government and its consultant only took issue with support for the \$5 million increase in PPF.

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<sup>5</sup> Of the \$107 million owed on the Initial Loan, the government challenged approximately \$6,297,406 million based on its consultant's declaration that the Trimont records did not show all of Lehman's advances. Govt. Opp'n. (Dkt. No. 912) at 40; Fedkenheuer Decl. (Dkt. No. 911) ¶ 12; 12/7/20 Govt. Letter (Dkt. No. 966) at 7.

<sup>6</sup> To assist the Court, we have listed in Appendix A to this letter the dates, descriptions and evidentiary support for Danske's Facility A and B claim.



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The Honorable Joseph F. Bianco  
December 21, 2020  
Page 6

Accordingly, there is no dispute as to **\$45 million** of the PPF. To assist the Court, we have also included Appendix B, which sets forth the support for the PPF.

**iii. Danske Has an Undisputed Claim of \$25,169,893.13 Million in Interest on Facilities A and B.**

Under the Third Amended and Restated Loan Agreement, Danske is entitled to receive interest calculated at 20% upon the occurrence of an event of default. Ex. 11 (MSJ Ex. 58 (Dkt. Nos. 856-3, 856-4) at DANSKE\_0012245). As cited in Danske's summary judgment motion, Danske is entitled to default interest. See Danske Reply (Dkt. No. 923) at 31; *In re Metmor Fin., Inc.*, 819 F.2d 446, 449 (4th Cir. 1987) (holding that lender was entitled to post-seizure interest and recognizing that "[t]he forfeiture cannot change the nature of [the lender's] rights"); *United States v. 1461 W. 42nd St., Miami, Fla.*, 998 F. Supp. 1438, 1441 (S.D. Fla. 1998) (holding that, because the government took an interest in forfeitable property subject to the rights an innocent lienholder bargained to obtain, a lender was entitled to recover lost principle, default interest, and late fees accrued as a result of government seizure of a property in a civil forfeiture proceeding); *United States v. 1461 W. 42nd St., Miami, Fla.*, No. 91-1077-CIV-DAVIS, 1999 U.S. Dist. LEXIS 23343, at \*3-4 (S.D. Fla. Mar. 10, 1999) (calculating amount of interest and late charges due to mortgagor). An event of default occurred in September 2019. MSJ Ex. 90 (Dkt. No. 860-10) (attached hereto as Exhibit 14).

Applying the default interest rate only to the \$106.1 million not in dispute, Danske is entitled to interest of **\$25,169,893.13 as of November 30, 2020**.<sup>7</sup> See Appendix C (a spreadsheet listing default interest accrual on Facilities A and B at \$106.1 million). To assist the Court, we have included as Appendix C, a spreadsheet setting forth the calculation of default interest.

**b) There Is No Legal Basis, and It Would Simply Be Inequitable and Unjust, to Apply Repayments Made on Additional Loans to Reduce the Amounts Owed under the Initial Lehman Loan**

The government argues that the Court should reduce the amount Danske is owed under the initial Lehman Loan by the amounts DCSL repaid Danske that were applied to repay additional loans that the government claims were not at arm's-length. 12/7/20 Govt. Letter (Dkt. No. 966) at 2. As we stated at the December 10, 2020 hearing, there is no basis in law for the government to do what it proposes here. At best, if Danske is not a bona fide purchaser for value under 21 U.S.C. § 853(n)(6) as to the additional loans, the government simply defeats Danske's claim as to any remaining unpaid principal balance of such additional loan. The government does not have a right to essentially claw-back those amounts and reapply those payments to the initial Lehman loan.

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<sup>7</sup> Interest continues to accrue at the default rate of 20% and, accordingly, Danske's total claim grows accordingly.





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The Honorable Joseph F. Bianco  
December 21, 2020  
Page 7

Not only is there no legal basis, it would be profoundly unjust if the Court were to do so and not recognize Danske's claim as to all amounts Danske advanced under the additional loans.

### **3. Danske Respectfully Submits that Discovery Is Not Warranted**

#### **a) Danske Has Provided Evidence Showing that Lehman Advanced \$107 Million.**

As to the \$6.297 million, facts in the record establish that Danske acquired the Lehman Loan, which was then advanced at \$107,529,665.05. In its briefing, the government disputed whether Lehman advanced \$107 million or \$101 million. Govt. Opp'n (Dkt. No. 912) at 39; Fedkenheuer Decl. (Dkt. No. 911) ¶ 12. The government relied on its consultant's review of the Trimont records and determination that the incomplete Trimont records showed Lehman advanced a total of \$101 million. But, Trimont invoices show that Lehman advanced and was owed \$107,529,665.05 as of September 3, 2008. Ex. 3 (MSJ Ex. 10 (Dkt. No. 850-10) at Danske\_0015614). From September 2008 through January 13, 2009, when Danske acquired all of Lehman's interest, the loan balance increased by \$8,662.78 (representing a borrower-paid service fee) to \$107,538,327.83. *Id.* These records establish Danske's claim to the full \$107 million of the Lehman Loan.

Moreover, what is at issue in this ancillary proceeding is not every Lehman advance, but what Danske purchased when it acquired the Lehman Loan. The Court found that it was indisputable that Danske purchased the Lehman Loan, which at that time was advanced at \$107,529,665.05. Specifically, as the Court stated in finding that Danske has a legal interest in the original Lehman Loan—

On September 15, 2008, Lehman filed for bankruptcy and default under the MRA. That same day the Bank of New York as custodian, sent a letter detailing the collateral that the bank had purchased under the repo agreement that was held for the bank's benefit. That's Exhibit 32 of the bank's summary judgment motion.

The DCSL Loan was among the collateral on page 30 of 31. Because of [the] Lehman default, the bank was entitled to retain some or all the assets of that collateral to offset the amount that Lehman owed under the repo agreement . . . .

11/23/2020 Hearing Tr. at 10-11. The Bank of New York letter specifically identifies the amount of the Lehman Loan at the time Danske acquired the loan as \$107,529,665.05. Ex. 2 (MSJ Ex. 32 (Dkt. No. 853-2) at DANSKE\_0016009). Given that the Court relied on the Bank of New York letter to find that Danske acquired an interest in the Lehman Loan, 11/23/20 Hearing Tr. at 12, it necessarily follows that the Court can rely on the Bank of New York letter to establish that the



The Honorable Joseph F. Bianco  
 December 21, 2020  
 Page 8

amount of the Lehman Loan that Danske purchased was \$107 million (with an obligation to fund up to \$125 million).

**b) There Is No Basis to Allow Additional Limited Discovery on What the Government Describes as Additional Loans.**

It is undisputed that Danske gave value when Danske advanced additional monies above the amounts required under the initial Lehman Loan. Further, in its November 23, 2020 ruling, the Court found that Danske was reasonably without knowledge of forfeiture. *See* 11/23/2020 Hearing Tr. at 7, 11, 16. Nothing more is required under the law for Danske to establish its claim as a bona fide purchaser for value. *See* 21 U.S.C. § 853(n)(6)(b) (“the petitioner is a bona fide purchaser for *value* of the right, title, or interest in the property and was at the time of purchase *reasonably without cause to believe that the property was subject to forfeiture* under this section”) (emphases added). Accordingly, Danske’s claim should be recognized in full and the government should not be entitled to additional discovery.

The government argues that additional loans made after the initial Lehman Loan were not “arm’s-length transactions” and thus Danske is not a bona fide purchaser. *See* Govt. Opp’n and MSJ (Dkt. No. 912) at 40. Before substantively addressing this argument, it bears clarifying what are the “additional loans.” Facility A and \$16 million of the principal balance of Facility B are not “additional loans” but emanate directly from the obligation Danske assumed from Lehman to fund up to \$125 million under the Lehman Loan. Thus, the only “additional loan” is \$2 million of the Facility B current principal balance of \$18 million and the \$14.1 million current principal balance of Facility C. We recognize that the government appears to consider every dollar advanced by Danske as an “additional loan,” but that is simply not the case.

Second, as to the government’s “arm’s-length” transaction argument, this is not a case where an “arm’s-length transaction” is at issue; this is a case involving a secured lender that got exactly what every secured lender gets—a right to repayment of amounts loaned plus interest in exchange for a senior secured interest in collateral, including but not limited to the real estate and business of the borrower (as well as the pledges and secured interests in the LLCs that own the Borrower). Cases where the issue of an “arm’s length transaction” is in question typically involve transfers between spouses or nominee owners, where there is an issue as to whether equivalent value was provided or whether the transfer was meant to avoid forfeiture.<sup>8</sup> *See, e.g., United States v. 1309 Fourth Street*, 12-cv-2263, 2015 WL 670572 (D. Or. Feb. 17, 2015) (“Because determining

<sup>8</sup> Additionally, the cases the government cited in its summary judgment briefing challenging Danske’s lending practices here are not forfeiture cases but are cases brought by regulators against bank directors for unsound lending practices. *See* Govt. Opp’n (Dkt. No. 912) at 41 (citing *Ulrich v. US Dept of Treasury*, 129 Fed. App’x 386 (9th Cir. 2005) and *De la Fuente v. F.D.I.C.*, 332 F.3d 1208 (9th Cir. 2003)).





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The Honorable Joseph F. Bianco  
December 21, 2020  
Page 9

whether a purchaser is ‘bona fide’ is especially difficult in intra-familial conveyances, courts properly consider whether the transaction was executed at arm’s length.”).

Here, there is no dispute that Danske gave value for its interest—Danske agreed to loan up to \$15 million under Facility C, advanced \$15 million, and sought in return repayment of principal plus interest at 15%. There is simply no question that Danske gave “equivalent value.”<sup>9</sup> This contrived argument that the transaction was not arm’s-length is not only factually incorrect, it is simply irrelevant.

Given the Court’s ruling and the fact that there is no question that Danske gave value and had no knowledge of potential forfeiture, Danske’s claim to additional loans should be recognized without any additional limited discovery.

**4. Danske Should Be Permitted to Foreclose on the Resort Property or the Government Must Move Forward With An Expedited Interlocutory Sale.**

Danske has represented to the Court and to the government that time is of the essence and that the Resort Property’s value has and will continue to diminish as a result of these proceedings and constrained liquidity preventing additional development. The effects of the Pandemic, which have wrought havoc in the resort and hotel industry, have not spared the Resort Property. Indeed, the Resort Property’s value has significantly declined even further as a result of the Pandemic and its impact on travel and hospitality. There is no realistic expectation that the value of the Resort Property will exceed the amount of Danske’s undisputed claim.

Even the government finally acknowledged this to be the case—

Well, I think if, I think for the sake of argument if the Court were to recognize the entire amount of the bank’s claim which is, you know, is increasing every day, then if, there would be no equity and we would not even become involved in an interlocutory sale at that point. So I think we needed to have some kind of parameters with regard to what the Court was going to recognize as to the amount of, in loans.

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<sup>9</sup> This also applies for every other advance, including those advances made under Facility C, made by Danske that the Government has lumped together as an additional loan. Danske advanced \$1.6 million when it acquired Lehman’s interest and in return sought no more than to be repaid \$1.6 million plus interest. Similarly, Danske advanced \$18 million under Facility B and in return sought repayment of that \$18 million plus interest. To the extent the borrower could not repay Danske the amounts it advanced, Danske would be repaid in whole or in part through its secured interest in the Resort Property.



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The Honorable Joseph F. Bianco  
December 21, 2020  
Page 10

12/10/20 Hearing Tr. at 18-19. Indeed, even if the Court recognized what the Government does not dispute, that total amount recognized would be over \$137 million (the government maintains in its December 7, 2020 letter that the undisputed amount on the initial Lehman loan is \$74,440,950, plus the undisputed \$45 million of the PPF, and plus interest due under that \$74,440,950 would be approximately \$17,659,046 as of November 30, 2020). Danske believes that even at \$137 million, there is no equity value in the Resort Property. Given that there is no expectation that a sale of the Resort Property will yield value above Danske's recognized and undisputed claim, the government should adhere to its guidelines and decline to continue pursuing forfeiture of the Resort Property and the Court should permit Danske to execute the remedies it is entitled to under the loan agreements.

Further, at the same time that the Resort Property's value is declining, the Borrower is not paying Danske interest or principal and Danske continues to face a diminishing likelihood of recovering some portion of the millions of dollars it has advanced and paid for its interest. Danske has no other means of recovering these funds, and therefore is being irreparably harmed as each month passes without allowing Danske to take action to lock in some measure of recovery for the portion of its claim for which it is now deemed a bona fide purchaser.

Given that there is no reasonable expectation that there will be value above Danske's claim, that the government has had the opportunity to sell the Resort Property and has done nothing outwardly to effectuate a sale, and that Danske's rights as well as the rights of other parties (i.e., homeowners, timeshare owners) are being affected, Danske respectfully submits that it should be permitted to foreclose on the Resort Property in Mexico.

There are also practical reasons to allow Danske to foreclose. Aside from the fact that Danske is an international bank with the capabilities and experience of effectuating a foreclosure and sale, the property is owned by a Mexican Trust for the benefit of Danske as first-place beneficiary and the government and this Court have no jurisdiction over the trust. Accordingly, the government cannot sell the Resort Property (assuming it could sell property in Mexico under Mexican law—which Danske does not believe it can) in an interlocutory sale without Danske's agreement because Danske is the first-place beneficiary under the Trust Agreement. Further, if the government, with the agreement of Danske, were able to effectuate a sale process, to the extent a sale did not pay all of Danske's recognized claim (which we believe is at least \$176.27 million), the Resort Property would remain encumbered by Danske's senior secured lien, which would make a sale highly unlikely unless Danske was willing to waive the remaining amounts owed under its recognized claim. *See Berkshire Bank v. Tedeschi*, No. 1:11-CV-0767 (LEK/CFH), 2013 U.S. Dist. LEXIS 43214 (N.D.N.Y. Mar. 27, 2013) (holding that a lien was not discharged where the mortgagee did not agree to discharge the balance of a debt remaining after a short sale).

As we mentioned in our prior letter, Danske could proceed with a foreclosure quickly and could do so with the oversight of this Court—including presenting the Court with its plan to



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The Honorable Joseph F. Bianco  
December 21, 2020  
Page 11

foreclose. To the extent the Court disagrees, it is imperative then for an interlocutory sale to go forward on an expedited basis.

We thank the Court for its time and attention to this matter.

Respectfully,

/s/ George Kostolampros

George Kostolampros  
Doreen S. Martin  
Xochitl S. Strohhahn

cc: All parties of record via ECF



The Honorable Joseph F. Bianco  
 December 21, 2020  
 Page 12

### APPENDIX A

Date	Description	Evidentiary Support
9/15/2008	Danske purchases loan from Lehman – it is listed on multiple documents as having a balance of \$107,529,665.05.	Exhibit 2 (MSJ Ex. 32 (Dkt. No. 853-2) at DANSKE_0016009); Exhibit 3 (MSJ Ex. 10 (Dkt. No. 850-10) at DANSKE_0015614).
12/18/2008	Balance of loan was \$107,538,327.83.	DANSKE_0016724 (12/18/08 Facility A Trimont Invoice) (attached hereto as Exhibit 16); Exhibit 3 (MSJ Ex. 10 (Dkt. No. 850-10) at DANSKE_0015614).
1/14/2009	Danske funded \$1,591,187.72 and \$8,812.28, or \$1,600,000.	Exhibit 6 at DANSKE_0016726; Exhibit 3 (MSJ Ex. 10 (Dkt. No. 850-10) at DANSKE_0015614).
3/6/2009	Danske funded \$16 million on Facility B, which was then structured as a revolving loan facility.	Exhibit 7 (MSJ Ex. 40 (Dkt. No. 853-10) at DANSKE_0013870-71).
March 2009-December 2011	<p>\$13,860,658.18 of interest was capitalized between March 2009 and December 2011.</p> <p>Total funding provided on April 26, 2013 was \$14.3 million. This advance was to pay for capitalized, unpaid interest of \$13.8 million and \$428,375 of modification fees relating to the execution of the Second Amended and Restated Loan Agreement.</p>	Exhibit 8 (Danske Facility A 2009-2016 Statement at DANSKE_0015375); Exhibit 9 (MSJ Ex. 57 (Dkt. No. 856-2) at DANSKE_0015736).
June 2015-Q3 2017	Principal Payments of approximately \$27.1 million.	Exhibit 12 (DANSKE_0015363-66, DANSKE_0015368-70); Exhibit 13 (Danske Facility A March 31, 2017 and August 9, 2017 Statements at DANSKE_0015704-5).
September 30, 2020	Principal Balance of Facility A is \$96.4 million.	Exhibit 17 (Supp. Daniel Decl. Ex. 1 (Dkt. No. 925-1) at DANSKE_0017872).
September 30, 2020	Principal Balance of Facility B is \$18 million.	Exhibit 18 (Supp. Daniel Decl. Ex. 2 (Dkt. No. 925-2) at DANSKE_0017873).



The Honorable Joseph F. Bianco  
 December 21, 2020  
 Page 13

### **APPENDIX B**

<b>Date</b>	<b>Description</b>	<b>Evidentiary Support</b>
3/2009	The PPF was created to allow the Borrower to repay unpaid interest of \$49,132,479 that accrued between March 2006-March 2009.	Exhibit 4 (MSJ Ex. 42 (Dkt. No. 854-2) at DANSKE_0015594); Exhibit 7 (MSJ Ex. 40 (Dkt. No. 853-10) at DANSKE_0013880).
3/6/2009	Amended and Restated Loan Agreement stated that the PPF was <i>to be the greater</i> of \$45 million or a formula of “thirty percent (30%) of the amount that is equal to the difference between (x) the Current Value . . . , less (y) the amount that is the lesser of (1) the outstanding principal balance of the Loan, or (2) the original face amount of the Notes (i.e., \$125,138,327.83).”	Exhibit 7 (MSJ Ex. 40 (Dkt. No. 853-10) at DANSKE_0013891-94).
4/2013	Calculation of the PPF was changed in the Second Amended and Restated Loan Agreement; the formula was removed in favor of a flat fee of \$50 million.	MSJ Ex. 51 (Dkt. Nos. 855-1, 855-2) at DANSKE_0011103, DANSKE_0011128 (attached hereto as <u>Exhibit 15</u> ).
4/2014	The parties execute the Third Amended and Restated Loan Agreement continues to entitle Danske to a \$50 million PPF.	Exhibit 11 (MSJ Ex. 58 (Dkt. Nos. 856-3, 856-4) at §§ 2.1 (DANSKE_0012255), 5.7 (DANSKE_0012279)).

## Appendix C

A&B	Interest Rate	Date	Beginning Principal Balance	Capitalized Interest	Ending Principal Balance	Daily Interest Accrual	Interest Paid	Accrued but unpaid interest
20%	4.125%	10/1/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		58,945.89
20%	4.125%	10/2/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		117,891.77
20%	4.125%	10/3/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		176,837.66
20%	4.125%	10/4/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		235,783.54
20%	4.125%	10/5/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		294,729.43
20%	4.125%	10/6/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		353,675.31
20%	4.125%	10/7/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		412,621.20
20%	4.125%	10/8/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		471,567.08
20%	4.125%	10/9/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		530,512.97
20%	4.125%	10/10/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		589,458.86
20%	4.125%	10/11/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		648,404.74
20%	4.125%	10/12/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		707,350.63
20%	4.125%	10/13/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		766,296.51
20%	4.125%	10/14/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		825,242.40
20%	4.125%	10/15/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		884,188.28
20%	4.125%	10/16/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		943,134.17
20%	4.125%	10/17/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,002,080.05
20%	4.125%	10/18/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,061,025.94
20%	4.125%	10/19/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,119,971.83
20%	4.125%	10/20/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,178,917.71
20%	4.125%	10/21/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,237,863.60
20%	4.125%	10/22/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,296,809.48
20%	4.125%	10/23/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,355,755.37
20%	4.125%	10/24/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,414,701.25
20%	4.125%	10/25/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,473,647.14
20%	4.125%	10/26/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,532,593.02
20%	4.125%	10/27/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,591,538.91
20%	4.125%	10/28/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,650,484.80
20%	4.125%	10/29/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,709,430.68
20%	4.125%	10/30/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,768,376.57
20%	4.125%	10/31/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,827,322.45
20%	4.125%	11/1/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,886,268.34
20%	4.125%	11/2/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		1,945,214.22
20%	4.125%	11/3/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,004,160.11
20%	4.125%	11/4/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,063,105.99
20%	4.125%	11/5/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,122,051.88
20%	4.125%	11/6/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,180,997.77
20%	4.125%	11/7/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,239,943.65
20%	4.125%	11/8/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,298,889.54
20%	4.125%	11/9/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,357,835.42
20%	4.125%	11/10/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,416,781.31
20%	4.125%	11/11/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,475,727.19
20%	4.125%	11/12/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,534,673.08
20%	4.125%	11/13/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,593,618.96
20%	4.125%	11/14/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,652,564.85
20%	4.125%	11/15/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,711,510.74
20%	4.125%	11/16/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,770,456.62
20%	4.125%	11/17/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,829,402.51
20%	4.125%	11/18/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,888,348.39
20%	4.125%	11/19/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		2,947,294.28
20%	4.125%	11/20/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,006,240.16
20%	4.125%	11/21/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,065,186.05
20%	4.125%	11/22/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,124,131.93
20%	4.125%	11/23/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,183,077.82
20%	4.125%	11/24/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,242,023.71
20%	4.125%	11/25/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,300,969.59
20%	4.125%	11/26/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,359,915.48
20%	4.125%	11/27/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,418,861.36
20%	4.125%	11/28/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,477,807.25
20%	4.125%	11/29/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,536,753.13
20%	4.125%	11/30/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,595,699.02
20%	4.125%	12/1/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,654,644.90
20%	4.125%	12/2/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,713,590.79
20%	4.125%	12/3/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,772,536.68
20%	4.125%	12/4/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,831,482.56
20%	4.125%	12/5/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,890,428.45
20%	4.125%	12/6/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		3,949,374.33
20%	4.125%	12/7/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,008,320.22
20%	4.125%	12/8/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,067,266.10
20%	4.125%	12/9/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,126,211.99
20%	4.125%	12/10/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,185,157.87
20%	4.125%	12/11/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,244,103.76
20%	4.125%	12/12/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,303,049.65
20%	4.125%	12/13/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,361,995.53
20%	4.125%	12/14/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,420,941.42
20%	4.125%	12/15/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,479,887.30
20%	4.125%	12/16/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,538,833.19
20%	4.125%	12/17/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,597,779.07
20%	4.125%	12/18/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,656,724.96
20%	4.125%	12/19/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,715,670.84
20%	4.125%	12/20/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,774,616.73
20%	4.125%	12/21/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,833,562.62
20%	4.125%	12/22/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,892,508.50
20%	4.125%	12/23/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		4,951,454.39
20%	4.125%	12/24/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		5,010,400.27
20%	4.125%	12/25/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		5,069,346.16
20%	4.125%	12/26/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		5,128,292.04
20%	4.125%	12/27/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		5,187,237.93
20%	4.125%	12/28/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		5,246,183.81
20%	4.125%	12/29/2019	\$106,102,594.00		\$106,102,594.00	58,945.89		5,305,129.70



20%	4.125%	12/30/2019	\$106,102,594.00	\$106,102,594.00	58,945.89	5,364,075.59
20%	4.125%	12/31/2019	\$106,102,594.00	\$106,102,594.00	58,945.89	5,423,021.47
20%	3.90800%	1/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,481,967.36
20%	3.90800%	1/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,540,913.24
20%	3.90800%	1/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,599,859.13
20%	3.90800%	1/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,658,805.01
20%	3.90800%	1/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,717,750.90
20%	3.90800%	1/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,776,696.78
20%	3.90800%	1/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,835,642.67
20%	3.90800%	1/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,894,588.56
20%	3.90800%	1/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	5,953,534.44
20%	3.90800%	1/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,012,480.33
20%	3.90800%	1/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,071,426.21
20%	3.90800%	1/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,130,372.10
20%	3.90800%	1/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,189,317.98
20%	3.90800%	1/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,248,263.87
20%	3.90800%	1/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,307,209.75
20%	3.90800%	1/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,366,155.64
20%	3.90800%	1/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,425,101.53
20%	3.90800%	1/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,484,047.41
20%	3.90800%	1/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,542,993.30
20%	3.90800%	1/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,601,939.18
20%	3.90800%	1/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,660,885.07
20%	3.90800%	1/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,719,830.95
20%	3.90800%	1/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,778,776.84
20%	3.90800%	1/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,837,722.72
20%	3.90800%	1/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,896,668.61
20%	3.90800%	1/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	6,955,614.50
20%	3.90800%	1/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,014,560.38
20%	3.90800%	1/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,073,506.27
20%	3.90800%	1/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,132,452.15
20%	3.90800%	1/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,191,398.04
20%	3.90800%	1/31/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,250,343.92
20%	3.90800%	2/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,309,289.81
20%	3.90800%	2/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,368,235.69
20%	3.90800%	2/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,427,181.58
20%	3.90800%	2/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,486,127.47
20%	3.90800%	2/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,545,073.35
20%	3.90800%	2/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,604,019.24
20%	3.90800%	2/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,662,965.12
20%	3.90800%	2/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,721,911.01
20%	3.90800%	2/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,780,856.89
20%	3.90800%	2/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,839,802.78
20%	3.90800%	2/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,898,748.66
20%	3.90800%	2/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	7,957,694.55
20%	3.90800%	2/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,016,640.44
20%	3.90800%	2/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,075,586.32
20%	3.90800%	2/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,134,532.21
20%	3.90800%	2/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,193,478.09
20%	3.90800%	2/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,252,423.98
20%	3.90800%	2/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,311,369.86
20%	3.90800%	2/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,370,315.75
20%	3.90800%	2/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,429,261.63
20%	3.90800%	2/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,488,207.52
20%	3.90800%	2/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,547,153.41
20%	3.90800%	2/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,606,099.29
20%	3.90800%	2/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,665,045.18
20%	3.90800%	2/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,723,991.06
20%	3.90800%	2/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,782,936.95
20%	3.90800%	2/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,841,882.83
20%	3.90800%	2/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,900,828.72
20%	3.90800%	2/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	8,959,774.60
20%	3.90800%	3/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,018,720.49
20%	3.90800%	3/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,077,666.38
20%	3.90800%	3/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,136,612.26
20%	3.90800%	3/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,195,558.15
20%	3.90800%	3/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,254,504.03
20%	3.90800%	3/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,313,449.92
20%	3.90800%	3/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,372,395.80
20%	3.90800%	3/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,431,341.69
20%	3.90800%	3/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,490,287.57
20%	3.90800%	3/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,549,233.46
20%	3.90800%	3/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,608,179.35
20%	3.90800%	3/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,667,125.23
20%	3.90800%	3/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,726,071.12
20%	3.90800%	3/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,785,017.00
20%	3.90800%	3/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,843,962.89
20%	3.90800%	3/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,902,908.77
20%	3.90800%	3/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	9,961,854.66
20%	3.90800%	3/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,020,800.54
20%	3.90800%	3/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,079,746.43
20%	3.90800%	3/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,138,692.32
20%	3.90800%	3/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,197,638.20
20%	3.90800%	3/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,256,584.09
20%	3.90800%	3/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,315,529.97
20%	3.90800%	3/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,374,475.86
20%	3.90800%	3/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,433,421.74
20%	3.90800%	3/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,492,367.63
20%	3.90800%	3/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,551,313.51
20%	3.90800%	3/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,610,259.40
20%	3.90800%	3/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,669,205.29
20%	3.90800%	3/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,728,151.17
20%	3.90800%	3/31/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,787,097.06
20%	3.10200%	4/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,846,042.94

20%	3.10200%	4/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,904,988.83
20%	3.10200%	4/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	10,963,934.71
20%	3.10200%	4/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,022,880.60
20%	3.10200%	4/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,081,826.48
20%	3.10200%	4/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,140,772.37
20%	3.10200%	4/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,199,718.26
20%	3.10200%	4/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,258,664.14
20%	3.10200%	4/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,317,610.03
20%	3.10200%	4/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,376,555.91
20%	3.10200%	4/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,435,501.80
20%	3.10200%	4/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,494,447.68
20%	3.10200%	4/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,553,393.57
20%	3.10200%	4/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,612,339.45
20%	3.10200%	4/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,671,285.34
20%	3.10200%	4/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,730,231.23
20%	3.10200%	4/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,789,177.11
20%	3.10200%	4/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,848,123.00
20%	3.10200%	4/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,907,068.88
20%	3.10200%	4/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	11,966,014.77
20%	3.10200%	4/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,024,960.65
20%	3.10200%	4/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,083,906.54
20%	3.10200%	4/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,142,852.42
20%	3.10200%	4/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,201,798.31
20%	3.10200%	4/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,260,744.20
20%	3.10200%	4/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,319,690.08
20%	3.10200%	4/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,378,635.97
20%	3.10200%	4/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,437,581.85
20%	3.10200%	4/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,496,527.74
20%	3.10200%	4/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,555,473.62
20%	3.10200%	5/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,614,419.51
20%	3.10200%	5/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,673,365.39
20%	3.10200%	5/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,732,311.28
20%	3.10200%	5/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,791,257.17
20%	3.10200%	5/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,850,203.05
20%	3.10200%	5/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,909,148.94
20%	3.10200%	5/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	12,968,094.82
20%	3.10200%	5/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,027,040.71
20%	3.10200%	5/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,085,986.59
20%	3.10200%	5/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,144,932.48
20%	3.10200%	5/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,203,878.36
20%	3.10200%	5/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,262,824.25
20%	3.10200%	5/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,321,770.14
20%	3.10200%	5/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,380,716.02
20%	3.10200%	5/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,439,661.91
20%	3.10200%	5/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,498,607.79
20%	3.10200%	5/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,557,553.68
20%	3.10200%	5/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,616,499.56
20%	3.10200%	5/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,675,445.45
20%	3.10200%	5/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,734,391.33
20%	3.10200%	5/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,793,337.22
20%	3.10200%	5/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,852,283.11
20%	3.10200%	5/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,911,228.99
20%	3.10200%	5/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	13,970,174.88
20%	3.10200%	5/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,029,120.76
20%	3.10200%	5/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,088,066.65
20%	3.10200%	5/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,147,012.53
20%	3.10200%	5/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,205,958.42
20%	3.10200%	5/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,264,904.30
20%	3.10200%	5/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,323,850.19
20%	3.10200%	5/31/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,382,796.08
20%	3.10200%	6/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,441,741.96
20%	3.10200%	6/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,500,687.85
20%	3.10200%	6/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,559,633.73
20%	3.10200%	6/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,618,579.62
20%	3.10200%	6/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,677,525.50
20%	3.10200%	6/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,736,471.39
20%	3.10200%	6/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,795,417.27
20%	3.10200%	6/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,854,363.16
20%	3.10200%	6/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,913,309.05
20%	3.10200%	6/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	14,972,254.93
20%	3.10200%	6/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,031,200.82
20%	3.10200%	6/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,090,146.70
20%	3.10200%	6/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,149,092.59
20%	3.10200%	6/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,208,038.47
20%	3.10200%	6/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,266,984.36
20%	3.10200%	6/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,325,930.24
20%	3.10200%	6/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,384,876.13
20%	3.10200%	6/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,443,822.02
20%	3.10200%	6/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,502,767.90
20%	3.10200%	6/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,561,713.79
20%	3.10200%	6/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,620,659.67
20%	3.10200%	6/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,679,605.56
20%	3.10200%	6/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,738,551.44
20%	3.10200%	6/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,797,497.33
20%	3.10200%	6/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,856,443.21
20%	3.10200%	6/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,915,389.10
20%	3.10200%	6/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	15,974,334.99
20%	3.10200%	6/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,033,280.87
20%	3.10200%	6/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,092,226.76
20%	3.10200%	6/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,151,172.64
20%	2.3100%	7/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,210,118.53
20%	2.3100%	7/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,269,064.41
20%	2.3100%	7/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,328,010.30
20%	2.3100%	7/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,386,956.18

20%	2.3100%	7/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,445,902.07
20%	2.3100%	7/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,504,847.96
20%	2.3100%	7/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,563,793.84
20%	2.3100%	7/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,622,739.73
20%	2.3100%	7/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,681,685.61
20%	2.3100%	7/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,740,631.50
20%	2.3100%	7/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,799,577.38
20%	2.3100%	7/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,858,523.27
20%	2.3100%	7/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,917,469.15
20%	2.3100%	7/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	16,976,415.04
20%	2.3100%	7/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,035,360.93
20%	2.3100%	7/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,094,306.81
20%	2.3100%	7/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,153,252.70
20%	2.3100%	7/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,212,198.58
20%	2.3100%	7/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,271,144.47
20%	2.3100%	7/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,330,090.35
20%	2.3100%	7/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,389,036.24
20%	2.3100%	7/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,447,982.12
20%	2.3100%	7/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,506,928.01
20%	2.3100%	7/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,565,873.90
20%	2.3100%	7/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,624,819.78
20%	2.3100%	7/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,683,765.67
20%	2.3100%	7/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,742,711.55
20%	2.3100%	7/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,801,657.44
20%	2.3100%	7/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,860,603.32
20%	2.3100%	7/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,919,549.21
20%	2.3100%	7/31/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	17,978,495.09
20%	2.3100%	8/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,037,440.98
20%	2.3100%	8/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,096,386.87
20%	2.3100%	8/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,155,332.75
20%	2.3100%	8/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,214,278.64
20%	2.3100%	8/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,273,224.52
20%	2.3100%	8/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,332,170.41
20%	2.3100%	8/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,391,116.29
20%	2.3100%	8/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,450,062.18
20%	2.3100%	8/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,509,008.06
20%	2.3100%	8/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,567,953.95
20%	2.3100%	8/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,626,899.84
20%	2.3100%	8/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,685,845.72
20%	2.3100%	8/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,744,791.61
20%	2.3100%	8/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,803,737.49
20%	2.3100%	8/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,862,683.38
20%	2.3100%	8/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,921,629.26
20%	2.3100%	8/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	18,980,575.15
20%	2.3100%	8/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,039,521.03
20%	2.3100%	8/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,098,466.92
20%	2.3100%	8/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,157,412.81
20%	2.3100%	8/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,216,358.69
20%	2.3100%	8/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,275,304.58
20%	2.3100%	8/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,334,250.46
20%	2.3100%	8/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,393,196.35
20%	2.3100%	8/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,452,142.23
20%	2.3100%	8/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,511,088.12
20%	2.3100%	8/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,570,034.00
20%	2.3100%	8/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,628,979.89
20%	2.3100%	8/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,687,925.78
20%	2.3100%	8/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,746,871.66
20%	2.3100%	8/31/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,805,817.55
20%	2.3100%	9/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,864,763.43
20%	2.3100%	9/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,923,709.32
20%	2.3100%	9/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	19,982,655.20
20%	2.3100%	9/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,041,601.09
20%	2.3100%	9/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,100,546.97
20%	2.3100%	9/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,159,492.86
20%	2.3100%	9/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,218,438.75
20%	2.3100%	9/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,277,384.63
20%	2.3100%	9/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,336,330.52
20%	2.3100%	9/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,395,276.40
20%	2.3100%	9/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,454,222.29
20%	2.3100%	9/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,513,168.17
20%	2.3100%	9/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,572,114.06
20%	2.3100%	9/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,631,059.94
20%	2.3100%	9/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,690,005.83
20%	2.3100%	9/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,748,951.72
20%	2.3100%	9/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,807,897.60
20%	2.3100%	9/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,866,843.49
20%	2.3100%	9/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,925,789.37
20%	2.3100%	9/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	20,984,735.26
20%	2.3100%	9/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,043,681.14
20%	2.3100%	9/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,102,627.03
20%	2.3100%	9/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,161,572.91
20%	2.3100%	9/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,220,518.80
20%	2.3100%	9/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,279,464.69
20%	2.3100%	9/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,338,410.57
20%	2.3100%	9/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,397,356.46
20%	2.3100%	9/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,456,302.34
20%	2.3100%	9/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,515,248.23
20%	2.3100%	9/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,574,194.11
20%	2.23700%	10/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,633,140.00
20%	2.23700%	10/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,692,085.88
20%	2.23700%	10/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,751,031.77
20%	2.23700%	10/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,809,977.66
20%	2.23700%	10/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,868,923.54
20%	2.23700%	10/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,927,869.43

20%	2.23700%	10/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	21,986,815.31
20%	2.23700%	10/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,045,761.20
20%	2.23700%	10/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,104,707.08
20%	2.23700%	10/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,163,652.97
20%	2.23700%	10/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,222,598.85
20%	2.23700%	10/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,281,544.74
20%	2.23700%	10/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,340,490.63
20%	2.23700%	10/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,399,436.51
20%	2.23700%	10/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,458,382.40
20%	2.23700%	10/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,517,328.28
20%	2.23700%	10/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,576,274.17
20%	2.23700%	10/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,635,220.05
20%	2.23700%	10/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,694,165.94
20%	2.23700%	10/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,753,111.82
20%	2.23700%	10/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,812,057.71
20%	2.23700%	10/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,871,003.60
20%	2.23700%	10/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,929,949.48
20%	2.23700%	10/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	22,988,895.37
20%	2.23700%	10/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,047,841.25
20%	2.23700%	10/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,106,787.14
20%	2.23700%	10/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,165,733.02
20%	2.23700%	10/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,224,678.91
20%	2.23700%	10/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,283,624.79
20%	2.23700%	10/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,342,570.68
20%	2.23700%	10/31/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,401,516.57
20%	2.23700%	11/1/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,460,462.45
20%	2.23700%	11/2/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,519,408.34
20%	2.23700%	11/3/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,578,354.22
20%	2.23700%	11/4/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,637,300.11
20%	2.23700%	11/5/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,696,245.99
20%	2.23700%	11/6/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,755,191.88
20%	2.23700%	11/7/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,814,137.76
20%	2.23700%	11/8/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,873,083.65
20%	2.23700%	11/9/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,932,029.54
20%	2.23700%	11/10/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	23,990,975.42
20%	2.23700%	11/11/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,049,921.31
20%	2.23700%	11/12/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,108,867.19
20%	2.23700%	11/13/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,167,813.08
20%	2.23700%	11/14/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,226,758.96
20%	2.23700%	11/15/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,285,704.85
20%	2.23700%	11/16/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,344,650.73
20%	2.23700%	11/17/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,403,596.62
20%	2.23700%	11/18/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,462,542.51
20%	2.23700%	11/19/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,521,488.39
20%	2.23700%	11/20/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,580,434.28
20%	2.23700%	11/21/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,639,380.16
20%	2.23700%	11/22/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,698,326.05
20%	2.23700%	11/23/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,757,271.93
20%	2.23700%	11/24/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,816,217.82
20%	2.23700%	11/25/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,875,163.70
20%	2.23700%	11/26/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,934,109.59
20%	2.23700%	11/27/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	24,993,055.48
20%	2.23700%	11/28/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	25,052,001.36
20%	2.23700%	11/29/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	25,110,947.25
20%	2.23700%	11/30/2020	\$106,102,594.00	\$106,102,594.00	58,945.89	25,169,893.13

Accrued Interest A	\$25,169,893.13
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Facy A & B	\$106,102,594.00
Accrued Interest	\$25,169,893.13
PPF	\$45,000,000.00
<b>TOTAL</b>	<b>\$176,272,487.13</b>